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 Attorneys for Plaintiff SYNOPSYS, INC.
 and for Defendants AEROFLEX INCORPORATED,
 AEROFLEX COLORADO SPRINGS, INC.,
 AMI SEMICONDUCTOR, INC., MATROX
 ELECTRONIC SYSTEMS, LTD., MATROX
 GRAPHICS, INC., MATROX INTERNATIONAL
 CORP., and MATROX TECH, INC.

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

RICOH COMPANY, LTD.,

Plaintiff,

vs.

AEROFLEX INCORPORATED, AMI
 SEMICONDUCTOR, INC., MATROX
 ELECTRONIC SYSTEMS LTD., MATROX
 GRAPHICS INC., MATROX
 INTERNATIONAL CORP., and MATROX
 TECH, INC.,

Defendants.

Case No. C03-4669 MJJ (EMC)

Case No. C03-2289 MJJ (EMC)

**DECLARATION OF DENISE M. DE MORY
 IN SUPPORT OF REPLY TO MOTION TO
 STAY**

Judge: Hon. Martin J. Jenkins

Date: April 19, 2006

Time: 9:00 a.m.

Ctrm: 11, 19th Floor

I, Denise M. De Mory, declare as follows:

1. I am an attorney at law licensed to practice in the State of California and a Partner of the law firm of Howrey LLP, attorneys for plaintiff Synopsys, and defendants Aeroflex Incorporated, Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems Ltd., Matrox Graphics Inc., Matrox International Corp., and Matrox Tech, Inc. The matters set forth in this declaration are based upon my personal knowledge, except where otherwise indicated, and if called as a witness, I could and would testify competently thereto.

2. Approximately 180 hours of depositions have occurred in this case. Ricoh has taken approximately 150 hours of depositions. Synopsys and the Customer Defendants have taken approximately 30 hours of depositions.

3. Synopsys and the Customer Defendants have produced more than 8 million pages of documents in this case.

4. Synopsys and the Customer Defendants have substantively responded to all of Ricoh's discovery requests – including over two hundred and fifty interrogatories. Ricoh has substantively responded to approximately twenty interrogatories.

5. Synopsys and the Customer Defendants have substantively responded to more than one hundred requests for admission. Ricoh has substantively responded to only five requests for admission, and has refused to substantively respond to over five hundred requests for admission.

6. On March 20, 2006, Ricoh sent a meet and confer request acknowledging that it wanted to take the following depositions: (1) deposition of Matrox relating to sales; (2) deposition of Matrox related to marketing; (3) AMI deposition regarding financials; (4) AMI continued 30(b)(6) on products; (5) an Aeroflex deposition on four 30(b)(6) topics; (6) continued deposition of Coco of Aeroflex; (7) continued deposition of Milliken of Aeroflex; (8) Synopsys 30(b)(6) on four topics; (9) individual deposition of Robert Walker of Synopsys; (10) individual deposition of Bharat Kalyanpur of Synopsys; and (11) additional continuations of the Synopsys 30(b)(6) technical depositions.

7. Synopsys and the Customer Defendants have requested 8 depositions, 5 of which Ricoh has refused to provide. Synopsys and the Customer Defendants' served Ricoh their portions of Joint Letters to Judge Chen on March 20, 2006 in an attempt to resolve these issues.

8. Synopsys and the Customer Defendants also will serve subpoenas on various third parties relating to invalidity during the week of March 20, 2006.

9. In addition to the discovery described above, Synopsys and the Customer Defendants will take damages and expert depositions.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was executed in San Francisco, CA on March 21, 2006.

/s/Denise M. De Mory

Denise M. De Mory